

PSJ3

Exhibit 384



Additional Steps HDMA Will Take in Support of the Industry Compliance Guidelines

1. Publicly announce establishment of the Industry Compliance Guidelines. Seek additional means to inform the public of the distribution industry's aggressive actions to perform due diligence regarding the distribution of these important patient-care products.
2. Identify for HDMA members consultant(s) to review practices and facilitate implementation of the Industry Compliance Guidelines.
3. Share the Industry Compliance Guidelines with allied trade associations, and encourage other segments of the supply chain to develop similar guidelines. Potential outreach may include other distributor groups, such as the Health Industry Distributors Association (HIDA), the National Association of Wholesale Distributors (NAWD) and the National Coalition of Pharmaceutical Distributors (NCPD), as well as pharmacy (National Association of Chain Drug Stores – NACDS and the National Community Pharmacy Association - NCPA) and manufacturer associations (Pharmaceutical Research and Manufacturers Association – PhRMA and the Generic Pharmaceutical Association -- GPHA).
4. Conduct outreach to the Pain Care Forum, comprised of healthcare industry representatives, practitioners and others interested in exchanging ideas regarding education and public policy issues surrounding the treatment of pain. HDMA plans to educate them on the development and implementation of the Industry Compliance Guidelines.
5. Meet with appropriate Members of Congress and/or staff to explain the Industry Compliance Guidelines and the distribution industry's good-faith attempt to meet DEA's expectations in the face of changing circumstances affecting diversion.
6. Provide education on the Industry Compliance Guidelines to HDMA members at its national Distribution Management Conference and Technology Expo, attended by nearly 600 industry leaders, including manufacturers, distributors and pharmacies.
7. Host a 90-minute free online Webinar on strategies to effectively implement the Industry Compliance Guidelines.
8. Post the Industry Compliance Guidelines to the HDMA Web site for members and others to access, free of charge.
9. Explore the feasibility of a one- to two-day seminar for distributors, manufacturers, dispensers, DEA and other law enforcement officials to develop and share information on best practices, investigation trends and criminal diversion activity. Distribution security experts and warehouse managers, in conjunction with law enforcement personnel, would share expertise, training methods and the latest technology that may be used to prevent diversion of prescription medicine.
10. Work with DEA to increase and enhance communications between DEA and HDMA's members. Includes supporting and boosting attendance and participation in DEA's Pharmaceutical Industry Conference, as well as stepped-up meetings and communications with DEA's Office of Diversion Control. Bolster education with DEA field and headquarters staff regarding distribution practices and technological advances in product tracking.
11. Identify opportunities to work with DEA to reach out to pharmacists and educate them on the latest strategies to detect prescription-drug diversion and counterfeiting. HDMA can approach pharmacy associations, state boards of pharmacy and the DEA to host and/or participate in innovative training sessions for pharmacists, who are often on the front lines.